

1 Bobbie J. Wilson, Bar No. 148317  
*BWilson@perkinscoie.com*  
2 Patrick S. Thompson, Bar No. 160804  
*PatrickThompson@perkinscoie.com*  
3 Sunita Bali, Bar No. 274108  
*SBali@perkinscoie.com*  
4 Mara Boundy, Bar No. 287109  
*MBoundy@perkinscoie.com*  
5 Maria Nugent, Bar No. 306074  
*MNugent@perkinscoie.com*  
6 **PERKINS COIE LLP**  
505 Howard Street, Suite 1000  
7 San Francisco, CA 94105-3204  
Telephone: 415.344.7000  
8 Facsimile: 415.344.7050  
9 Attorneys for Defendant  
GOOGLE LLC  
10

11 **UNITED STATES DISTRICT COURT**  
12  
**NORTHERN DISTRICT OF CALIFORNIA**  
13  
**SAN JOSE DIVISION**

14 PATRICIA WEEKS, ALICIA HELMS,  
15 BRIAN MCCLOY, and ADRIAN  
16 ALCARAZ, individually and on behalf  
of all others similarly situated,

17 Plaintiffs,  
18 v.  
19 GOOGLE LLC,  
20 Defendant.

Case No. 5:18-cv-00801-NC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
MATERIALS SUBMITTED IN  
CONNECTION WITH PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

## [PROPOSED] ORDER

Plaintiffs have filed an Administrative Motion to Seal (Dkt. 93) portions of (i) Plaintiffs' Motion for Class Certification ("Plaintiffs' Class Cert. Motion") (Dkt. No. 94), (ii) the Expert Report of Shahin Nazarian ("Nazarian Report") (Dkt. 94-8), (iii) the Expert Report of Stefan Boedeker ("Boedeker Report") (Dkt. No. 94-7), and (iv) Exhibits 1-2, 22 and B to the Declaration of Adam E. Polk ("Polk Decl.") (Dkt. No. 95-1) in support of Plaintiffs' Motion for Class Certification.

Having considered Plaintiffs' Administrative Motion to Seal and the Declaration of Mara Boundy in support thereof, **IT IS HEREBY ORDERED THAT** Plaintiffs' Administrative Motion to Seal is **GRANTED** as follows:

Plaintiffs' Class Cert. Motion (Dkt. No. 94)	Court's Ruling
<p>Page i:11-12, 14;</p> <p>Page 2:2-3, 14;</p> <p>Page 3:17-18, 23-25;</p> <p>Page 6:1;</p> <p>Page 7:1-4, 22-24;</p> <p>Page 8:1, 5-28;</p> <p>Page 9:12-13, 19-20;</p> <p>Page 10:1-10, 12-14, 18-23;</p> <p>Page 12:25;</p> <p>Page 14:12-13;</p> <p>Page 20:23-24; and</p> <p>Page 21:2-5.</p>	Seal proposed redacted portions
Page 3:10-11	Seal proposed redacted portions

Plaintiffs' Class Cert. Motion (Dkt. No. 94)	Court's Ruling
Page 2:10-12; Page 6:12-22; Page 9:1-4, 23-26; and Page 19:16-17.	Seal proposed redacted portions

Nazarian Report (Dkt. No. 94-8)	Court's Ruling
Redacted portions of page 6, ¶ 17 and the image appearing on page 6.	Seal proposed redacted portions
Redacted portions of page 7, ¶¶ 19-20 and the image appearing on page 7.	Seal proposed redacted portions
Redacted portions of page 8, ¶¶ 22-24 and fn. 7.	Seal proposed redacted portions
Redacted portions of page 9, ¶ 25, fn. 9.	Seal proposed redacted portions
Redacted portions of page 10, ¶¶ 27-29, fn.12.	Seal proposed redacted portions
Certain redacted portions of page 11, ¶ 34 (proposed redactions in first sentence only).	Seal proposed redacted portions
Certain redacted portions of the following:  Page 12, ¶ 35 (only seeking to seal redacted information in (i) the second line of ¶ 35 beginning with “resulted in”; (ii) the second line of ¶ 35 beginning with “developed a”; and (iii) the third line);  Page 12, fn. 15 (seeking to seal all redacted portions);  Page 12, fn. 16 (only seeking to seal (i) the parenthetical explanation of Plaintiffs’ citation to GOOG-WEEKS-00000115 and (ii) the parenthetical explanation of Plaintiffs’ citation to James Dep. 83:15-24);  Page 12, fn. 17 (seeking to seal all redacted portions).	Seal proposed redacted portions

Nazarian Report (Dkt. No. 94-8)	Court's Ruling
Redacted portions of page 14, ¶ 41.	Seal proposed redacted portions
Redacted portions of page 15, ¶ 46.	Seal proposed redacted portions
Redacted portions of page 17, ¶ 49.	Seal proposed redacted portions
Redacted portions of page 19, ¶ 53.	Seal proposed redacted portions
Redacted portions of page 20, ¶¶ 57-58.	Seal proposed redacted portions
Redacted portions of page 21, ¶¶ 61-63.	Seal proposed redacted portions

Boedeker Report (Dkt. 94-7)	Court's Ruling
Redacted portions of page 2, ¶ 8.	Seal proposed redacted portions
Redacted portions of page 3, ¶ 9.	Seal proposed redacted portions
Redacted portions of page 9, ¶ 24, fn. 6.	Seal proposed redacted portions
Redacted portions of page 43, ¶ 112.	Seal proposed redacted portions
Redacted portions of page 44, ¶ 114, fn. 60.	Seal proposed redacted portions

Exhibits to Polk Decl. (Dkt. 95)	Court's Ruling
Exhibit 1 (Dkt. 95-1 at 26)	Seal proposed redacted portions
Exhibit 2 (Dkt. 95-1 at 27)	Seal proposed redacted portions
Exhibit 22 (Dkt. 95-1 at 327)	Seal proposed

1	Exhibits to Polk Decl. (Dkt. 95)	Court's Ruling
2		redacted portions
3	Exhibit B (Dkt. 95-1 at 12), James Dep. at 28:8-30:3.	Seal proposed redacted portions
4	Ex. B, James Dep. at 31:2-7, 41:9-10, 85:1-18 and 128:14-18.	Seal proposed redacted portions
5	Ex. B, James Dep. at 33:5-25	Seal proposed redacted portions
6	Ex. B, James Dep. at 34:1-35:18, 35:24-36:3, 36:12-25.	Seal proposed redacted portions
7	Ex. B, James Dep. at 38:7-10.	Seal proposed redacted portions
8	Ex. B, James Dep. at 39:1-18.	Seal proposed redacted portions
9	Ex. B, James Dep. at 40:7-41:4.	Seal proposed redacted portions
10	Ex. B, James Dep. at 82:9-11, 14-25.	Seal proposed redacted portions
11	Ex. B, James Dep. at 88:2-19.	Seal proposed redacted portions
12	Ex. B, James Dep. at 89:7-16.	Seal proposed redacted portions
13	Ex. B, James Dep. at 93:1-2.	Seal proposed redacted portions
14	Ex. B, James Dep. at 93:24-25, 94:6-95:1-96:8, 98:11-25 and 107:1-8.	Seal proposed redacted portions
15	Ex. B, James Dep. at 108:17-25, 116:1-117:18 and 128:20-24.	Seal proposed redacted portions
16	Ex. B, James Dep. at 123:1-5, 7-19 and 124:4-5, 8-25.	Seal proposed redacted portions
17	Ex. B, James Dep. at 131:5-25, 135:8-25.	Seal proposed redacted portions
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

1	<b>Exhibits to Polk Decl. (Dkt. 95)</b>	<b>Court's Ruling</b>
2	Ex. B, James Dep. at 135:1-3, 139:3-5, 140:4-7, 140:19-142:25, 145:6-146:11, 146:13-147:7, 148:17- 25, 149:7-25, 154:7-155:24, 156:2-18, 157:7-158:25, 161:1-8, 161:19-162:2, 162:4-5, 162:7-25, 165:1- 166:4, and 166:24-25.	3 Seal proposed 4 redacted portions

5  
6 IT IS SO ORDERED.  
7

8 DATED: \_\_\_\_\_

9 HON. NATHANAEL COUSINS  
10 UNITED STATES MAGISTRATE JUDGE  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28